

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)

Amendment of Section 73.202(b),)
Table of Allotments, FM Broadcast Stations.)
Ehrenberg, First Mesa, Kachina Village,)
Wickenburg, and Williams, Arizona))

(Ehrenberg, First Mesa, and Kachina Village,)
Arizona))

(First Mesa and Munds Park, Arizona))

MB Docket No. 11-207

RM-11517

RM-11518 and
File No. BPH-20080915AFP

RM-_____ and
File No. BPH-20120321ACZ

FILED/ACCEPTED

Directed to: Office of the Secretary
Attention: Audio Division, Media Bureau

MAR - 6 2012

Federal Communications Commission
Office of the Secretary

REPLY COMMENTS

Grenax Broadcasting II, LLC ("Grenax"), by its attorneys, hereby respectfully submits its Reply Comments in the above-referenced proceeding. In its Counterproposal and Response to Order to Show Cause in this proceeding, Grenax demonstrated that the public interest would be better served by an allotment of Channel 246C2 as a second local service at Munds Park, Arizona, with a substitution of Channel 281C for Channel 247C at First Mesa, Arizona, to accommodate the Munds Park allotment, than by the proposal set forth in the Notice of Proposed Rule Making and Order to Show Cause," DA 11-2058, released December 23, 2011 ("NPRM").

Univision Radio License Corporation ("Univision") also filed comments in this proceeding. In its "Comments and Response to Order to Show Cause," Univision discusses at some length the service that it would provide to underserved people within its expanded service area. To add some much needed perspective, though, it must be remembered that such new service represents only a

miniscule portion of the expansion proposed by Univision. Based on Univision's own figures on pages 4 to 5 of its "Comments," for the number of people who would receive second, third, or fourth service, the total percentage of underserved people that would received new service would be 0.18 percent. Indeed, Exhibit 1A shows that the total percentage of people within the KHOV-FM proposed 60 dBu contour which receive 12 or fewer services is only 0.3 percent. Thus, 99.7 percent of the population within the KHOV-FM service area can receive 13 or more services and can only be considered to be quite well-served. Comments and Response to Order to Show Cause at Exhibit 1-A, page 3. Indeed, the chart shows that only 0.2 percent of the population within the service area is limited to ten or fewer services. *Id.* Given that this figure means that 99.8 percent of the population has double the amount of services necessary to be considered well-served, it is clear that service to underserved areas represents a truly *de minimis* portion of Univision's overall proposal.

The reason for the large number of already well-served people within the KHOV-FM contour is equally clear. The community of Wickenburg is only 54 miles away from the major metropolitan area of Phoenix. <http://Arizona-leisure.com/Wickenburg.arizona.html>. Thus, it only stands to reason that many of the listeners that would be included in the expanded KHOV-FM service area live in the suburban communities to the north and northwest of Phoenix. Wickenburg is located primarily in Maricopa County, which is home to over half of the population of the state of Arizona. <http://www.wickenburgchamber.com/wp-content/uploads/pdf/2009/MaricopaCounty.pdf>. In addition, to Phoenix, the cities of Glendale, Scottsdale, Tempe, and other communities are also located in Maricopa County. This metropolitan county has already attracted a number of radio stations, as is evidenced by the fact that 99.8 percent of KHOV-FM's listeners are already well-served.

In contrast, Munds Park is located in an isolated area in need of further service. As noted in Grenax's Counterproposal, Munds Park is located in a valley with mountains and a national forest surrounding it. Munds Park also is separated in concerns and interests from other areas in light of the fact that its population has a substantially greater average age. Nonetheless, a substantial percentage of its workers are employed in the Census Designated Place of Munds Park, as the 2010 U.S. Census estimates that 39.2 percent of the workforce work in the Munds Park CDP. Furthermore, 40.6 percent of the workforce commutes less than ten minutes and therefore must work in the greater Munds Park area. It is therefore clear that Munds Park is a substantial and independent community in need of its own competing radio service.

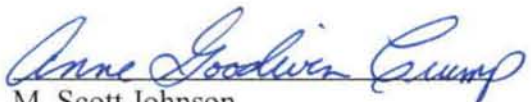
Finally, as the Munds Park proposal is for a new station, its entire service area would represent a new service. Such service is particularly important to people living in isolated areas who would like to keep up with the events in the area at large. Furthermore, the residents of Munds Park, with their demographics which are so markedly different from those of the nearest urbanized area, have an especial need for a radio station that will focus on the community residents, particular issues and needs.

In sum, Grenax hereby reiterates its support for the allotment of Channel 246C2 to Munds Park as the communities second local service and the substitution of Channel 281C for

Channel 247C at First Mesa to accommodate this allotment. The community of Munds Park is a separate community, with needs and interests of its own, which is in need of such a first competitive local transmission service.

Respectfully submitted,

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March 6, 2012

CERTIFICATE OF SERVICE

I, Deborah N. Lunt, hereby state that copies of the foregoing REPLY COMMENTS were sent, by first class mail, postage prepaid, this 6th day of March, 2012, to the following:

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